

#04-7984  
P.C. 8400187

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**Date:** 7/9/04 2:56PM  
**Subject:** Docket Number # 04-7984

Dear Sir,

These are my comments regarding the proposed guidelines. All of them are focused on oral fluid:

1- Use of an FDA-cleared collection device should be required for oral fluid. It would be more convenient due to oral fluid collection by spitting in a bottle is unsanitary, impractical, and unpleasant.

2- OraSure has published data showing that environment contamination may occur within the first 30 min after exposure, but clears thereafter.

3- The proposed guidelines do not allow use of oral fluid testing for follow-up and return to duty testing due to short detection time. It should be considered that oral fluid testing of over 77,000 specimens produced nearly identical and in some cases better detection rates compared to urine testing (Cone et al., JAT, 26:541-546, 2002).

Thank you so much for considering my comments.

Best regards

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